

# United States District Court

## DISTRICT OF DELAWARE

UNITED STATES OF AMERICA

v.

ROBERT RAMSEUR


Criminal Complaint  
Case No. 05 - 75M

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CR05-42-JJF

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.  
On or about April 15, 2005 in New Castle County, in the District of Delaware, defendant did knowingly possess with intent to distribute a substance containing heroin, a controlled substance, in violation of Title 21 United States Code, Section(s) 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2. I further state that I am a(n) Special Agent, DEA and that this complaint is based on the following facts:

See attached Affidavit

Continued on the attached sheet and made a part hereof: Yes

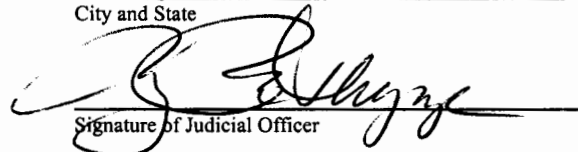
  
Signature of Complainant  
Mark T. McHugh  
Special Agent  
Drug Enforcement Administration

Sworn to before me and subscribed in my presence,

April 15, 2005 at  
Date

Wilmington, DE  
City and State

Honorable Kent A. Jordan  
United States District Court Judge  
Name & Title of Judicial Officer

  
Signature of Judicial Officer

**AFFIDAVIT**

Your affiant, Special Mark T. McHugh of the Drug Enforcement Administration (DEA), does solemnly swear that:

1. I am a Special Agent (S/A) with the Drug Enforcement Administration (DEA), United States Department of Justice, and have been so employed since September 1995. During the course of my law enforcement career, I have participated in several hundred criminal investigations in both the undercover and surface capacity involving violations of state and federal narcotics laws, which led to arrests, convictions of violators, and seizures of narcotics and proceeds gained from illegal activity.

2. The information contained in this affidavit is based on both my personal knowledge as well as information provided to me by other law enforcement officers who participated in this investigation. This affidavit is submitted in support of a criminal complaint against Robert RAMSEUR.

3. On April 15, 2005, at approximately 8:05 a.m., members of the Wilmington Police Department ("WPD") Drug, Organized Crime and Vice Squad observed a black male exit the rear of 2506 Thatcher Street in Wilmington, Delaware and enter a silver Dodge Neon that was parked directly behind 2506 Thatcher Street. Other WPD officers followed the silver Dodge Neon. As the silver Dodge Neon was traveling east on 26th Street, WPD officers facing west on 26th Street identified the driver of the silver Dodge Neon as Robert RAMSEUR, whom they knew from a prior check via DelJIS does not possess a valid driver's license.

4. After the WPD officers activated their audible and visual emergency equipment and attempted to execute a traffic stop, Robert RAMSEUR continued to drive the silver Dodge Neon at a very high rate of speed. At the top of the 12th Street Bridge in Wilmington, Robert

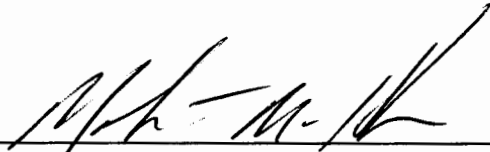
RAMSEUR pulled the silver Dodge Neon to the west side lane, exited the vehicle carrying a black plastic bag, ran to the west side of the bridge, and then jumped over a guard rail. Leaning over the bridge, Robert RAMSEUR tore open the black plastic bag and dropped it into the water.

5. The WPD officers observed the black plastic bag floating on the water below the bridge and observed smaller packages consistent with heroin packaging coming out of the black plastic bag. Other WPD detectives then retrieved the packaging from the water, including in excess of 400 clear plastic heat-sealed bags each containing a blue wax bag stamped "Versache." Each blue wax bag contained a white chalky substance. The contents of a blue wax bag field-tested positive for heroin. Based on my training and experience, I believe that, in total, approximately 8g of a substance containing heroin were retrieved.

6. Based on your affiant's training, knowledge, and experience, it is your affiant's belief that the seized heroin was intended for distribution. This conclusion is based on factors including the quantity, packaging, and street value (at least \$6000) of the seized heroin.

**WHEREFORE**, based on the above-stated facts, your affiant believes that there is probable cause to believe that Robert RAMSEUR has committed the crime of knowingly possessing with the intent to distribute a mixture or substance containing a detectable amount of heroin, a schedule I narcotic controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C); and prays that a criminal complaint be issued.

I, the undersigned, swear that the above-stated facts are true to the best of my knowledge and belief.

  
Special Agent Mark T. McHugh  
Drug Enforcement Administration